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July 24, 2025

VIA ECF

Hon. Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

Re: Trump v. Simon & Schuster, et al., Case No. 1:23-cv-06883 (PGG)(BCM)

Dear Judge Gardephe,

Pursuant to Your Honor's Individual Rules of Practice 1(D), and 4(A), and Local Civil Rule 7.1(d), Plaintiff Donald J. Trump, through undersigned counsel, respectfully submits this letter-motion to request an extension of the deadline to file a motion for leave to file a Third Amended Complaint, as set forth in the Court's Memorandum Opinion and Order dated July 18, 2025 [ECF. No. 83]. The current deadline is August 18, 2025. Plaintiff seeks to extend this deadline to September 11, 2025.

Plaintiff has conferred with opposing counsel, who have agreed to this extension, rendering the relief stipulated. This request is made to accommodate the schedules of all counsel involved, who face significant impending deadlines and work commitments during the interim period.

Specifically, undersigned counsel is engaged in preparing for court appearances and filing deadlines in unrelated matters through mid-August, including a summary judgment motion due in mid-August, 2025, which conflicts with the time needed to draft a comprehensive motion addressing the Court's Opinion.

This 24-day extension will allow all parties to prepare a thorough motion and proposed Third Amended Complaint that fully responds to the Court's identified deficiencies, ensuring efficient progression of the case without undue pressure.

Should the Court deem a pre-motion conference necessary under Rule 1(C), Plaintiff respectfully requests one to discuss the anticipated motion. Alternatively, given the stipulated nature of this request, Plaintiff submits that no conference is required, and a proposed order granting the extension is attached as Exhibit A for the Court's convenience.

This letter-motion is filed via ECF, with copies provided to all counsel of record. Plaintiff appreciates the Court's consideration of this request and is available at the Court's convenience to discuss this matter further.



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Respectfully Submitted,

Robert Garson

cc: All Counsel of Record (via ECF)